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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **DECLARATION OF OLIVIA FLECHSIG**
) **IN SUPPORT OF PLAINTIFF MARK**
) **SNOOKAL’S MOTION IN LIMINE NO. 4**
) **–MOTION TO EXCLUDE REFERENCE**
) **TO PLAINTIFF’S CARDIAC MEDICAL**
) **HISTORY AFTER SEPTEMBER 2019**
)
) *[Filed concurrently with Plaintiff’s Notice of*
) *Motion and Motion in Limine No. 4 – Motion*
) *to Exclude Reference to Plaintiff’s Cardiology*
) *Records and [Proposed] Order Granting*
) *Plaintiff’s Motion in Limine No. 4]*
)
) District Judge: Hon. Hernan D. Vera
) Magistrate Judge: Hon. A. Joel Richlin
) Action Filed: August 3, 2023
) Trial Date: August 19, 2025
)
) Hearing Date: July 24, 2025
) Hearing Time: 10:00 a.m.
) Courtroom: 5B
)
)
)

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal (“Plaintiff” or “Mr. Snookal”). As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff’s Motion in Limine No. 4 - Motion to Exclude Reference to Plaintiff’s Cardiac Medical History after September of 2019.

3. I am informed that on May 10, 2024, counsel for Defendant Chevron USA, Inc. took the deposition of Mr. Snookal. I am in possession of a certified copy of same. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of Mr. Snookal’s deposition.

4. In Defendant Chevron USA Inc.’s (“Defendant”) (Second) Motion for Summary Judgment, Defendant wrote that “Plaintiff’s offer for the [Reliability Engineering Manager] position was rescinded on or about September 4, 2019.” (See Dkt 43-1 at 7:8-9.) Plaintiff does not dispute that on or about September 4, 2019, he was notified of Chevron’s decision to deem him “not fit for duty” for the Reliability Engineering Manager position. (See e.g., Dkt 43-1 at 30:16-18 (“On or about August 15, 2019, Dr. Eshiofe Asekomeh documented Chevron’s finding that Mr. Snookal was “not fit for duty,” citing Mr. Snookal’s thoracic aneurysm, and on or about September 4, 2019, Chevron informed Mr. Snookal of same.”).)

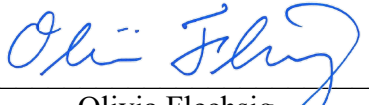
5. Attached hereto as **Exhibit 2** is a true and correct redacted copy of documents produced as SNOOKAL-01673-1679, medical records reflecting a July 2023 outpatient cardiac ablation performed on Mr. Snookal to correct his premature ventricular complexes (“PVC’s”). I am informed and believe that Mr. Snookal had a second outpatient cardiac ablation on or about February of 2024 because the first procedure was unsuccessful.

6. On June 17, 2025, Dolores Y. Leal and I met and conferred with counsel for Defendant, Tracey Kennedy and Robert Mussig, via Zoom videoconference regarding the topics required by Local Rule 16-2, including Plaintiff’s anticipated motions in limine. Further to this call, on June 18, 2025, I sent a meet and confer email to Ms. Kennedy and Mr. Mussig to further

1 meet and confer.

2 7. On June 23, 2025, Mr. Mussig responded to my meet and confer email. Regarding
3 the content of this motion in limine, Mr. Mussig wrote, *inter alia*, that “[w]e don’t believe
4 excluding references to Mr. Snookal’s medical history from September 2019 onwards is
5 appropriate. He had two heart surgeries, for example, which would go to his emotional distress
6 as well as to his wage claims (both surgeries were during the 3-4 year scheduled ex pat
7 assignment.”

8 I declare under penalty of perjury under the laws of the State of California
9 that the foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at
10 Los Angeles, California.

11
12 
13 Olivia Flechsig